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Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO ADVO INTERROGATORY  
(ADVO/USPS-T13-80)

The United States Postal Service hereby provides the revised response of witness Raymond to the following interrogatory of Advo, Inc.: ADVO/USPS-T13-80, filed on March 20, 2000. As noted at the hearings, three observations were inadvertently omitted from the end of the table in the previously filed response. See Tr. 19/8027-28. These omissions have been corrected.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
Richard T. Cooper

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Washington, D.C. 20260-1137  
May 17, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND TO  
INTERROGATORIES OF ADVO, INC.  
REVISED 5/17/00**

ADVO/USPS-T13-80. In your response to MPA/USPS-T13-15, which asked you to describe how data collectors were selected and trained, you provided the following information with respect to Phase 2 data collectors:

- Three of the Phase 2 data collectors participated in Phase 1 data collections.
- Six new data collectors received on-the-job training for three weeks during the Phase 2 data collections.
- Eighteen new data collectors received on-the-job training for two weeks during the Phase 2 data collections.

With respect to this response, please answer the following:

(a) The above three categories total up to 27 data collectors. However, your response to MPA/USPS-T13-16 lists 47 data collectors (by observer code number) in Phase 2. Please state the correct total number of data collectors that participated in any part of the Phase 2 data collections.

(b) Does this mean that an additional 20 data collectors were hired sometime after the 27 identified above? If not, please indicate the correct number of additional data collectors hired.

(c) Please explain how much on-the-job training (in days or weeks) these last 20 data collectors received. If the amount varied by individual, please indicated the range of training.

(d) Are the "observer code numbers" arranged in the order of hire; e.g., do the last 20 observer code numbers correspond to the 20 last-hired data collectors in (b) above? If not, provide a list that groups observer code numbers by training category.

**RESPONSE:**

(a) Yes, a total of 47 data collectors participated in Phase 2.

(b) Yes, 20 data collectors were added during the Phase 2 data collection.

(c) The observers used after the initial group received 2 to 3 weeks training with two of the original 27 observers. The observer based on their ability to learn the objects to be recognized, the associated barcodes, the techniques for operation

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of the equipment, would have their length of training determined by the OJT

team. The Post Office Subject matter expert and the quality control personnel

would also verify the ability of the observer(s).

(d) No. Listing is as follows showing the date the observer started.

Code	Phase	Phase2	First 6	Second 18	Last 20	Date Started
OBS02	X					
OBS04	X					
OBS05	X					
OBS06	X					
OBS07	X					
OBS08	X	X				
OBS09		X	1			3/24/97
OBS10		X			14	6/30/97
OBS12	X	X				
OBS13	X	X				
OBS14		X	2			3/24/97
OBS15		X	3			3/24/97
OBS16		X	4			3/24/97
OBS17		X	5			3/24/97
OBS18		X	6			3/24/97
OBS19		X			1	4/14/97
OBS20		X			2	4/14/97
OBS21		X			3	4/14/97
OBS22		X			4	4/14/97
OBS23		X			5	4/14/97
OBS24		X			6	4/14/97
OBS25		X			7	4/14/97
OBS26		X			8	4/14/97
OBS27		X			9	4/14/97
OBS31		X			10	4/14/97
OBS32		X			11	4/14/97
OBS33		X			12	4/14/97
OBS35		X			13	4/14/97
OBS36		X			14	4/14/97
OBS37		X			15	4/14/97
OBS38		X			16	4/14/97
OBS39		X			17	4/14/97

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OBS40	X	18	4/14/97
OBS42	X	1	4/28/97
OBS43	X	2	5/5/97
OBS46	X	3	5/13/97
OBS47	X	4	5/13/97
OBS45	X	5	5/19/97
OBS48	X	6	5/19/97
OBS49	X	7	5/26/97
OBS50	X	8	6/2/97
OBS29	X	9	6/16/97
OBS30	X	10	6/16/97
OBS28	X	11	6/30/97
OBS51	X	12	6/30/97
OBS52	X	13	6/30/97
OBS53	X	15	7/21/97
OBS54	X	16	7/28/97
OBS55	X	17	8/19/97
OBS57	X	18	12/15/97
OBS56	X	19	12/22/97
OBS58	X	20	1/2/98
OBS59	X	21	1/26/98
OBS60	X	22	11/26/97
OBS61	X	23	1/24/98


## DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond  
Date: 5-17-00

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

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